

1 ROGER GRANDGENETT, ESQ.  
Nevada Bar No. 6323  
2 HILARY MUCKLEROY, ESQ.  
Nevada Bar No. 9632  
3 LITTLER MENDELSON, P.C.  
3960 Howard Hughes Parkway  
4 Suite 300  
Las Vegas, Nevada 89169  
5 Telephone: 702.862.7738  
Facsimile: 702.862.8881  
6 [RGrandgenett@littler.com](mailto:RGrandgenett@littler.com)  
[HMuckleroy@littler.com](mailto:HMuckleroy@littler.com)

7 Attorneys for Defendant  
8 AIDS HEALTHCARE FOUNDATION

9  
10 UNITED STATES DISTRICT COURT  
11 DISTRICT OF NEVADA

12 RENE GARCIA, an individual,  
13 Plaintiff,

14 v.

15 AIDS HEALTHCARE FOUNDATION, a  
16 foreign non-profit corporation; DOES I-X;  
17 and ROE CORPORATIONS 1-X,  
18 Defendant.

Case No. 2:19-cv-00404-JCM-NJK

**STIPULATION AND ORDER TO EXTEND  
TIME TO FILE A RESPONSIVE  
PLEADING**

**[FIRST REQUEST]**

19 Plaintiff RENE GARCIA ("Plaintiff") and Defendant AIDS HEALTHCARE FOUNDATION  
20 ("Defendant"), by and through their respective undersigned counsel, hereby request that the Court  
21 extend the deadline for Defendant to file its first responsive pleading, which is currently set for April  
22 15, 2019, for a period of fifteen (15) days, until April 30, 2019. This is the first stipulation for an  
23 extension of time to file the first responsive pleading. Any and all defenses are preserved and retained  
24 and that no defense is waived by this request.

25  
26 This request is made in good faith and not to cause unnecessary delay as Defendant had needed  
27 to obtain local counsel in this matter. As a result, the extension requests is for a limited and reasonable  
28 amount of time.

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

IT IS SO STIPULATED.

Dated: April 12, 2019

/s/ Jenny L. Foley  
JENNY L. FOLEY, ESQ.  
Nevada Bar No. 9017  
HKM EMPLOYMENT ATTORNEYS LLP  
Attorneys for Plaintiff  
RENE GARCIA

Dated: April 12, 2019

/s/ Hilary Muckleroy  
HILARY MUCKLEROY, ESQ.  
Nevada Bar No. 9632  
LITTLER MENDELSON, P.C.  
Attorneys for Defendant  
AIDS HEALTHCARE FOUNDATION

**ORDER**

**IT IS SO ORDERED.**

DATED: April 15, 2019

  
UNITED STATES MAGISTRATE JUDGE